

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

**IN RE WILMINGTON TRUST
SECURITIES LITIGATION**

This document relates to: ALL ACTIONS

Master File No. 10-cv-00990-SLR

(Securities Class Action)

Hon. Sue L. Robinson

ELECTRONICALLY FILED

JURY TRIAL DEMANDED

**DECLARATION OF HANNAH ROSS IN SUPPORT OF THE THIRD AMENDED
CONSOLIDATED SECURITIES CLASS ACTION COMPLAINT**

I, Hannah Ross, hereby state as follows:

1. I am a Partner with the law firm of Bernstein Litowitz Berger & Grossmann LLP, Counsel for Lead Plaintiff Automotive Industries Pension Trust and Merced County Employees' Retirement Association, and Co-Lead Counsel for the Class in the above-captioned action. I am a member in good standing of the Bar of the State of New York and am admitted to appear *pro hac vice* in this action. I respectfully submit this declaration in support of the Third Amended Consolidated Securities Class Action Complaint. I have personal knowledge of the facts set forth herein and, if called upon to do so, could and would competently testify thereto.

2. Annexed hereto as Exhibit 1 is a true and correct copy of Wilmington Trust Corporation's ("Wilmington's") January 18, 2008 earnings press release for the fourth quarter of 2007.

3. Annexed hereto as Exhibit 2 is a true and correct copy of Wilmington's Form 10-K and Annual Report for the year ending December 31, 2007, filed with the Securities and Exchange Commission ("SEC") on February 28, 2008.

4. Annexed hereto as Exhibit 3 is a true and correct copy of Wilmington's April 18, 2008 earnings press release for the first quarter of 2008.

5. Annexed hereto as Exhibit 4 is a true and correct copy of the Form 10-Q for the first quarter of 2008, filed with the SEC on May 12, 2008.

6. Annexed hereto as Exhibit 5 is a true and correct copy of the July 18, 2008 earnings press release for the second quarter of 2008.

7. Annexed hereto as Exhibit 6 is a true and correct copy of the Form 10-Q for the second quarter of 2008, filed with the SEC on August 11, 2008.

8. Annexed hereto as Exhibit 7 is a true and correct copy of the October 17, 2008 earnings press release for the third quarter of 2008.

9. Annexed hereto as Exhibit 8 is a true and correct copy of the Form 10-Q for the third quarter of 2008, filed with the SEC on November 10, 2008.

10. Annexed hereto as Exhibit 9 is a true and correct copy of the January 30, 2009 earnings press release for the fourth quarter of 2008.

11. Annexed hereto as Exhibit 10 is a true and correct copy of the Form 10-K for the year ending December 31, 2008, filed with the SEC on March 2, 2009.

12. Annexed hereto as Exhibit 11 is a true and correct copy of the April 24, 2009 earnings press release for the first quarter of 2009.

13. Annexed hereto as Exhibit 12 is a true and correct copy of the Form 10-Q for the first quarter of 2009, filed with the SEC on May 11, 2009.

14. Annexed hereto as Exhibit 13 is a true and correct copy of the July 17, 2009 earnings press release for the second quarter of 2009.

15. Annexed hereto as Exhibit 14 is a true and correct copy of the July 24, 2009 earnings press release for the second quarter of 2009.

16. Annexed hereto as Exhibit 15 is a true and correct copy of the Form 10-Q for the second quarter of 2009, filed with the SEC on August 10, 2009.

17. Annexed hereto as Exhibit 16 is a true and correct copy of the October 23, 2009 earnings press release for the third quarter of 2009.

18. Annexed hereto as Exhibit 17 is a true and correct copy of the Form 10-Q for the third quarter of 2009, filed with the SEC on November 9, 2009.

19. Annexed hereto as Exhibit 18 is a true and correct copy of the January 29, 2010 press release for the year ending Dec. 31, 2009.

20. Annexed hereto as Exhibit 19 is a true and correct copy of the Form 10-K for the year ending 2009, filed with the SEC on February 22, 2010.

21. Annexed hereto as Exhibit 20 is a true and correct copy of the April 23, 2010 press release for the first quarter 2010.

22. Annexed hereto as Exhibit 21 is a true and correct copy of the Form 10-Q for the first quarter of 2010, filed with the SEC on May 10, 2010.

23. Annexed hereto as Exhibit 22 is a true and correct copy of the transcript of the January 18, 2008 earnings conference call.

24. Annexed hereto as Exhibit 23 is a true and correct copy of the transcript of the January 30, 2009 earnings conference call.

25. Annexed hereto as Exhibit 24 is a true and correct copy of the transcript of the October 23, 2009 earnings conference call.

26. Annexed hereto as Exhibit 25 is a true and correct copy of the transcript of the June 4, 2010 special conference call.

27. Annexed hereto as Exhibit 26 is a true and correct copy of the transcript of the July 23, 2010 earnings conference call.

28. Annexed hereto as Exhibit 27 is a true and correct copy of Wilmington's Shelf Registration Statement filed with the SEC on Form S-3ASR on November 29, 2007.

29. Annexed hereto as Exhibit 28 is a true and correct copy of Wilmington's Post-Effective Amendment to Automatic Shelf Registration Statement filed with the SEC on Form POSASR on January 12, 2009.

30. Annexed hereto as Exhibit 29 is a true and correct copy of Wilmington's Prospectus Supplement (to Prospectus dated January 12, 2009) dated February 23, 2010.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 9th day of January, 2013, in New York, New York.

/s/ *Hannah Ross*

HANNAH ROSS